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*Counsel for Ignition Switch Pre-Closing  
Accident Plaintiffs Represented by  
Hilliard Muñoz Gonzales L.L.P.  
Listed on Exhibit C Hereto*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re: :  
MOTORS LIQUIDATION COMPANY, et al., : Chapter 11  
f/k/a General Motors Corp., et al., : Case No.: 09-50026 (MG)  
Debtors. : (Jointly Administered)  
-----X

**NOTICE OF WITHDRAWAL AS COUNSEL OF RECORD FOR CERTAIN MOVANTS  
UNDER OMNIBUS MOTION BY CERTAIN IGNITION SWITCH PRE-CLOSING  
ACCIDENT PLAINTIFFS FOR AUTHORITY TO FILE LATE PROOFS OF CLAIM  
FOR PERSONAL INJURIES AND WRONGFUL DEATHS [DOCKET NO. 13807]**

**WHEREAS**, Goodwin Procter, LLP (“**Goodwin**”) represents the law firms of Hilliard Muñoz Gonzales L.L.P. (“**HMG**”) and Thomas J. Henry Injury Attorneys (“**TJHIA**”) in connection with their representation of claimants asserting personal injury and wrongful death claims against the debtors in the above-captioned chapter 11 cases (“**Old GM**”) and General Motors LLC (“**New GM**”).

**WHEREAS**, on December 22, 2016, Goodwin filed that certain *Omnibus Motion By Certain Ignition Switch Pre-Closing Accident Plaintiffs for Authority to File Late Proofs of Claim for Personal Injuries and Wrongful Deaths* [Docket No. 13807] (the “**Motion**”) on behalf of those certain HMG and TJHIA clients listed on Exhibit A to the Motion (the “**Movants**”). Attached as Exhibit B to the Motion were copies of each Movant’s proposed proof of claim against Old GM’s chapter 11 estate.

**WHEREAS**, on October 18, 2017, in connection with the multi-district litigation pending before the Honorable Jesse M. Furman of the United States District Court for the Southern District of New York, *In re General Motors LLC Ignition Switch Litigation*, MDL No. 2543 (JMF) (S.D.N.Y.) (the “**MDL**”), HMG and TJHIA filed a Motion to Withdraw as counsel of record for certain plaintiffs in the MDL [MDL Docket No. 4712] (the “**MDL Motion to Withdraw**”).

**WHEREAS**, on November 27, 2017, Judge Furman entered Order No. 137 in the MDL granting the MDL Motion to Withdraw [MDL Docket No. 4840]. A copy of Order No. 137 is attached hereto as Exhibit A. Order No. 137 provides, *inter alia*, that HMG and TJHIA are to serve the plaintiffs affected by the MDL Motion to Withdraw with notice of Order No. 137 in order to provide those plaintiffs with an opportunity to file a new lawsuit in the MDL by

February 26, 2018. Any plaintiff that fails to file a new lawsuit by February 26, 2018 will be subject to having his or her claims against New GM dismissed. Order No. 137 at ¶ 4.

**WHEREAS**, pursuant to Order No. 137, those certain Movants listed on Exhibit B (the “Affected Movants”) hereto are no longer clients of HMG or TJHIA.

**NOW THEREFORE, PLEASE TAKE NOTICE THAT**, pursuant to Rule 2090-1(f) of the Local Bankruptcy Rules for the Southern District of New York, Goodwin withdraws as counsel of record for the Affected Movants in these chapter 11 cases and will not be prosecuting the Motion on behalf of the Affected Movants. A list of the Movants on whose behalf Goodwin continues to pursue the Motion is attached hereto as Exhibit C. Consistent with Order No. 137, HMG and TJHIA will provide the Affected Movants with this notice in order to give them an opportunity to find replacement counsel to join in the Motion or otherwise pursue authority to file a late proof of claim in these chapter 11 cases.

Dated: December 4, 2017

Respectfully submitted,

/s/ William P. Weintraub

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